



## U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

May 7, 2025

Conference Adjourned

From:

To:

SO ORDERED:

P. KEVIN CASTEL, U.S.D.J.

Date:

VIA ECF

Hon. P. Kevin Castel  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

May 9, 2025  
June 25, 2025 at 2:00pm

*[Signature]*  
P. KEVIN CASTEL, U.S.D.J.

5 - 8 - 2025

Re: *Saifa Mohamed Kassim v. Noem, et al.*, No. 25 Civ. 1645 (PKC) In person, Courtroom 11D

Dear Judge Castel:

This Office represents the defendants (the "government") in this mandamus action, in which the plaintiff seeks an order directing U.S. Citizenship and Immigration Services ("USCIS") to adjudicate an allegedly unduly delayed Petition for Alien Relative ("Form I-130"). This action was filed on February 26, 2025, and based on the date of service on this Office, the government's response to the complaint is due on May 26, 2025.

On February 27, 2025, Your Honor entered an Initial Pretrial Conference Order scheduling the Initial Pretrial Conference for May 9, 2025, and directing the parties to submit a joint letter by May 2, 2025, five business days before the conference. *See* ECF No. 9. Counsel for the Plaintiff and for the government both inadvertently neglected to calendar the conference and the deadline for the submission of the joint letter. The parties apologize to the Court for the oversight.

With respect to the merits of the case, the parties hope to resolve this matter consensually prior to the due date for the government's response to the complaint. Therefore, the parties respectfully request adjournment of the Initial Pretrial Conference and required submissions *sine die*. Should the parties be unable to resolve this matter without litigation, the government will file a motion to dismiss. This is the parties' first request for adjournment of the conference and the deadline for the joint letter.

I thank the Court for its consideration of this request.

Respectfully submitted,

JAY CLAYTON  
United States Attorney

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*Attorney for Defendants*

cc: Counsel of record (via ECF)